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11 KENNETH GOULD

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 vs.
18 KENNETH GOULD,
19 Defendant.

20 Case No. 1:21-cr-00243-JLT-SKO

21 **STIPULATION TO CONTINUE STATUS
22 CONFERENCE; ORDER**

23 Date: March 15, 2023
24 Time: 1:00 p.m.
25 Judge: Hon. Sheila K. Oberto

26 IT IS HEREBY STIPULATED by and between the parties through their respective
27 counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Assistant
28 Federal Defender Erin Snider, counsel for Kenneth Gould, that the status conference currently
scheduled for November 30, 2022, at 1:00 p.m. may be continued to March 15, 2023, at 1:00
p.m.

29 The parties agree and request that the Court make the following findings:

30 1. By previous order, this matter was set for a status conference on November 30,
31 2022.

32 2. The government has produced 21,658 bates-marked items in this matter.

33 3. Counsel for Mr. Gould requires additional time to review discovery, consult with
34 her client regarding the case, and conduct necessary investigation.

35 4. Counsel for Mr. Gould believes that failure to grant the above-requested

continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

5. The government does not object to the continuance.

6. Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, within which trial must commence, the time period of November 30, 2022, to March 15 2023, inclusive, is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

IT IS SO STIPULATED.

Respectfully submitted,

PHILLIP A. TALBERT
United States Attorney

Date: November 22, 2022

/s/ Joseph Barton
JOSEPH BARTON
Assistant United States Attorney
Attorney for Plaintiff

HEATHER E. WILLIAMS
Federal Defender

Date: November 22, 2022

/s/ *Erin Snider*
ERIN SNIDER
Assistant Federal Defender
Attorney for Defendant
KENNETH GOULD

ORDER

IT IS SO ORDERED. The status conference currently scheduled for November 30, 2022, at 1:00 p.m. is hereby continued to March 15, 2023, at 1:00 p.m. Time is excluded.

IT IS SO ORDERED.

Dated: **November 22, 2022**

/s/ *Eric P. Groj*
UNITED STATES MAGISTRATE JUDGE